

Exhibit 1

{885844.DOC}

Marc Rosenberg

From: Marie Vestal Sharpe
Sent: Friday, November 06, 2015 4:09 PM
To: chenry@hdm-legal.com; kmiller@millerlawspokane.com
Cc: Marc Rosenberg
Subject: Calugas v. Patenaude & Felix - Discovery to Plaintiff
Attachments: Calugas - Def Patenaude & Felix's First Rogs and RFP to Pl Calugas.pdf

Ms. Henry and Mr. Miller,

Attached please find Defendant Patenaude & Felix, A.P.C.'s First Set of Interrogatories and Requests for Production to your client, Jennyl Calugas, in the above-captioned matter. The original will be delivered via messenger to Ms. Henry, copies to all other counsel in this matter by messenger or U.S. Mail.

Thank you,
Marie

Marie Vestal Sharpe | VCard | Email Legal Assistant to: Marc Rosenberg, Sam B. Franklin, Bradley D. Westphal

Lee Smart, P.S., Inc. | 1800 One Convention Place | 701 Pike St. | Seattle, WA 98101 | www.leesmart.com
Telephone 206.624.7990 | Toll-free 1.877.624.7990 | Fax 206.624.5944

CONFIDENTIALITY NOTICE: This email message may be protected by the attorney/client privilege, work product doctrine or other confidentiality protection. If you believe that it has been sent to you in error, do not read it. Please reply to the sender that you have received the message in error, then delete it. Thank you.

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Hon. Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JENNYL CALUGAS,

Plaintiff,

vs.

PATENAUDE & FELIX, A.P.C., a California
Corporation; and MATTHEW CHEUNG, an
individual,

Defendants.

No. 2:15-cv-01332-MJP

DEFENDANT PATENAUDE & FELIX,
A.P.C.'S FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION
TO PLAINTIFF JENNYL CALUGAS

PATENAUDE & FELIX, A.P.C.,

Third-Party Plaintiff,

vs.

LAW OFFICES OF ANTOINETTE M.
DAVIS, PLLC,

Third-Party Defendants.

TO: Jennyl Calugas, Plaintiff

AND TO: All Counsel of Record

DEFENDANT PATENAUDE & FELIX, A.P.C.'S FIRST
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PLAINTIFF JENNYL CALUGAS - 1
2:15-cv-01332-MJP
5820679.doc

LEE • SMART

P.S., Inc. • Pacific Northwest Law Offices

1800 One Convention Place • 701 Pike Street • Seattle • WA • 98101-3929
Tel. 206.624.7990 • Toll Free 877.624.7990 • Fax 206.624.5944

1 I. INSTRUCTIONS

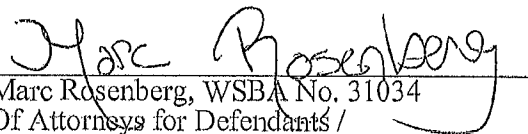
2 Pursuant to Fed. R. Civ. P 33 and 34, you are requested to supply answers to
3 interrogatories and responses to requests for production on the following pages. As required
4 by Fed. R. Civ. P 33 and 34, please provide full and complete answers and responses to each
5 and every part in the blank space provided, inserting additional pages where necessary; verify
6 your answers on the form provided after the last interrogatory; and serve a complete set of the
7 interrogatories, answers and attachments on the undersigned within thirty (30) days of receipt
8 hereof. These interrogatories are continuing, pursuant to Fed. R. Civ. P 26(e), and defendant
9 requests that answers and responses are supplemented in the event new or additional
10 information becomes known.

11 Privilege. If in responding or failing to respond to a discovery requested herein you
12 invoke or rely upon any privilege of any kind, please state specifically the nature of the
13 privilege and the basis on which you invoke, rely or claim it, and identify all documents or
14 other information, including contracts and communications which you believe to be embraced
15 by the privilege invoked. Please then produce a privilege log.

16 You are requested to produce for inspection and copying the documents and tangible
17 things listed herein at the offices of Lee, Smart, P. S., Inc. at 1800 One Convention Place, 701
18 Pike Street, Seattle, Washington 98101, within 30 days of service of this request.

19 Respectfully submitted this 6th day of November, 2015.

20 LEE SMART, P.S., INC.

21
22 By: 
23 Marc Rosenberg, WSBA No. 31034
24 Of Attorneys for Defendants /
25 Third-Party Plaintiffs

DEFENDANT PATENAUDE & FELIX, A.P.C.'S FIRST
INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PLAINTIFF JENNYL CALUGAS - 2
2:15-cv-01332-MJP
5820679.doc

LEE • SMART

P.S., Inc. • Pacific Northwest Law Offices

1800 One Convention Place • 701 Pike Street • Seattle • WA • 98101-3929
Tel. 206.624.7990 • Toll Free 877.624.7990 • Fax 206.624.5944

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

II. INTERROGATORIES AND REQUESTS FOR PRODUCTION

INTERROGATORY NO. 1. Identify all persons having knowledge of the relevant facts pertaining to this case, including contact information, and a brief statement of the information that these persons have or may have. This request is intended to include all potential witnesses known to you or your attorneys.

ANSWER:

REQUEST FOR PRODUCTION NO. 1. If you kept a diary, journal, calendar, or similar record at any time within the last five (5) years, please produce each diary, journal, calendar, or similar record in its entirety.

RESPONSE.

INTERROGATORY NO. 2. Set forth with particularity each and every element of damages that you allege was incurred by you specifically as a result only of the acts and omissions that you allege were taken by Defendants, including special and general damages, if any, setting forth the amount of damage and the analysis used by you to compute the damages.

ANSWER:

REQUEST FOR PRODUCTION NO. 2. Produce all documents that support the response that Plaintiff provided to the preceding interrogatory.

RESPONSE.

1 **INTERROGATORY NO. 3.** If you have ever been involved in any other claims or
2 lawsuits as a claimant, plaintiff, defendant, or other type of party, whether civil, criminal,
3 domestic, or any type of proceeding, please provide a complete description of the proceeding or
4 dispute, including such things, where applicable, as the year, jurisdiction, cause number, parties
5 involved, and a basic description of the proceedings, including resolution of the matter.

6 **ANSWER:**

7
8 **REQUEST FOR PRODUCTION NO. 3.** Produce all documents in Plaintiff's
9 possession related to or arising from any debt owed by Plaintiff to National Collegiate Trust.

10 **RESPONSE.**

11
12 **INTERROGATORY NO. 4.** With respect to each and every communication that you
13 may claim to have had with Defendants related to your claims in the above-referenced matter,
14 whether written or oral, please set forth the date of the meeting, discussion and/or written letter;
15 the names of those present; the location of the meeting and/or discussion; the length of the
16 meeting and/or discussion; a statement describing the subject matter discussed and information
17 conveyed by each party for each meeting and/or discussion identified; and identify with
18 specificity each and every document which supports the facts or information set forth in
19 response to the preceding interrogatory

20 **ANSWER:**

21
22 **REQUEST FOR PRODUCTION NO. 4.** Produce all written communications
23 between Plaintiff and Defendants.

24 **RESPONSE.**

1 **INTERROGATORY NO. 5.** Please identify all places where you have been
2 employed for the last 10 years, including the name and address of each employer, your job title,
3 and the amount you were paid.

4 **ANSWER:**

5
6 **REQUEST FOR PRODUCTION NO. 5.** Excluding communications with or to your
7 attorney, please produce all notes, files, or any other document that you kept in regard to any
8 communications occurring between you and Defendant. However, produce these documents
9 even if you subsequently also provided such documents to your attorney.

10 **RESPONSE.**

11
12
13 **INTERROGATORY NO. 6.** Identify all electronic devices that you use, including
14 computers, cell phones, or any other electronic media in which you create or save documents or
15 communicate with other via email, texts, or other electronic means.

16 **ANSWER:**

17
18
19 **REQUEST FOR PRODUCTION NO. 6.** Produce the credit report Plaintiff alleges to
20 have obtained in ¶ 4.19 of the Amended Complaint.

21 **RESPONSE.**

CERTIFICATE

The undersigned attorneys for plaintiff have read the foregoing Answers to Interrogatories and Responses to Requests for Production and certify that they are in compliance with Federal Rules 26 through 37.

DATED this ____ day of _____, 2015, in Seattle, WA.

KIRK D. MILLER, P.S.

By: _____
Kirk D. Mille, WSBA No. 40025
Of Attorneys for Plaintiff

ANTOINETTE M. DAVIS LAW, PLLC

By: _____
Antoinette M. Davis, WSBA No. 29821
Of Attorneys for Plaintiff /
Third-Party Defendant

HENRY, DEGRAAFF & MCCORMICK, P.S.

By: _____
Christina L. Henry, WSBA No. 31273
Of Attorneys for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

VERIFICATION

STATE OF WASHINGTON)
) ss
COUNTY OF KING)

_____, being first duly sworn on oath, depose and say:

I am a plaintiff in the above action, have read the foregoing Answers to Interrogatories and Responses to Requests for Production, know the contents thereof, and believe the same to be true and complete.

SUBSCRIBED AND SWORN TO before me this _____ day of _____, 2015.

Notary Public in and for the State
of Washington, residing at _____
My commission expires: _____

DECLARATION OF SERVICE

I, declare that on the date provided below, I caused the foregoing document to be served on the following individual(s) in the manner specified:

Counsel for Plaintiff

Ms. Christina L. Henry
Henry, DeGraaff & McCormick, P.S.
1833 N. 105th Street, Suite 200
Seattle, WA 98133

Via: E-mail and Legal Messenger

Mr. Kirk D. Miller
Kirk D. Miller, P.S.
421 W. Riverside Ave, Ste 704
Spokane, WA 99201

Via: E-mail and U.S. Mail

Counsel for Third-Party Defendant

Mr. C. Steven Fury
Mr. Scott David Smith
Fury Duarte, P.S.
710 10th Avenue E.
Seattle, WA 98102

Via: Legal Messenger

Ms. Vonda M. Sargent
Law Office of Vonda M. Sargent
119 First Avenue S., Suite 500
Seattle, WA 98104

Via: Legal Messenger

I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED November 6, 2015, at Seattle, Washington.

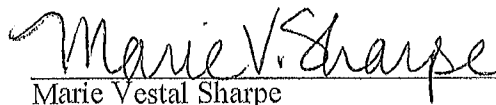

Marie Vestal Sharpe

Exhibit 2

{885844.DOC}

Marc Rosenberg

From: Marc Rosenberg
Sent: Monday, December 07, 2015 10:19 AM
To: 'Christina Henry'
Cc: 'kmiller@millerlawspokane.com'; Marie Vestal Sharpe; Jonathan J. Loch
Subject: RE: 15-01332 - Calugas v Patenaude & Felix et al

Christina: I generally believe in extending such professional courtesies when requested. Extension granted. Plaintiffs' responses to the discovery requests are now due on 12/14/15.

Marie: Please re-calendar for me. Thanks.

Marc

From: Christina Henry [mailto:chenry@hdm-legal.com]
Sent: Monday, December 07, 2015 10:15 AM
To: Marc Rosenberg <Mr@leesmart.com>
Cc: 'kmiller@millerlawspokane.com' <kmiller@millerlawspokane.com>
Subject: 15-01332 - Calugas v Patenaude & Felix et al

Marc,
I am writing to you to request a week extension of the discovery due to your client today. We need an additional week to coordinate the sign of from our client Jenny Calugas. Thank you.

Christina L. Henry, *Attorney*
Henry, DeGraaff & McCormick, P.S.
1833 N. 105th St.
Suite 203
Seattle, Washington 98133
Tel 206/330-0595
Fax 206-400-7609
chenry@HDM-legal.com

CONFIDENTIALITY NOTICE: This e-mail may contain information that is protected by the attorney-client and/or the attorney-work product privilege. It is intended only for the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If you are not the intended recipient ANY USE, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. If you have received this communication in error, please immediately notify us by return e-mail or telephone at the e-mail address or telephone number listed above and destroy this transmission and any attachments without reading or saving in any manner. Thank you

Exhibit 3

{885844.DOC}

Marc Rosenberg

From: Marc Rosenberg
Sent: Friday, December 18, 2015 10:09 AM
To: 'Christina Henry'
Cc: kmiller@millerlawspokane.com; Marie Vestal Sharpe; Jonathan J. Loch
Subject: RE: 15-01332 - Calugas v Patenaude & Felix et al

Thank you. We will look forward to receiving it.

Marc

From: Christina Henry [mailto:chenry@hdm-legal.com]
Sent: Friday, December 18, 2015 9:18 AM
To: Marc Rosenberg <Mr@leesmart.com>
Cc: kmiller@millerlawspokane.com; Marie Vestal Sharpe <mvs@leesmart.com>; Jonathan J. Loch <jjl@leesmart.com>
Subject: Re: 15-01332 - Calugas v Patenaude & Felix et al

We will have a response today

Christina Henry
Henry, DeGraaff & McCormick, PS
1833 N 105th St SE
Seattle, WA 98133
Tel# 206-330-0595
Fax# +1-206-400-7609
chenry@hdm-legal.com

On Dec 18, 2015, at 8:03 AM, Marc Rosenberg <Mr@leesmart.com> wrote:

Please respond. Thanks.

Marc

From: Marc Rosenberg
Sent: Wednesday, December 16, 2015 9:30 AM
To: 'Christina Henry' <chenry@hdm-legal.com>
Cc: 'kmiller@millerlawspokane.com' <kmiller@millerlawspokane.com>; Marie Vestal Sharpe <mvs@leesmart.com>; Jonathan J. Loch <jjl@leesmart.com>
Subject: RE: 15-01332 - Calugas v Patenaude & Felix et al

Christina

We granted your requested extension until 12/14/15 to provide discovery responses, but I do not believe that we received the discovery responses when the time case. Please advise us as to the status of these discovery requests.

Please contact us if you have questions.

Marc Rosenberg | Attorney at Law | [VCard](#) | [Email](#) | [Bio](#)

Lee Smart, P.S., Inc. | 1800 One Convention Place | 701 Pike St. | Seattle,
WA 98101 | www.leesmart.com
Telephone 206.624.7990 | Toll-free 1.877.624.7990 | Fax 206.624.5944 | Direct Line
206.262.8308

CONFIDENTIALITY NOTICE: This email message may be protected by the attorney/client privilege, work product doctrine or other confidentiality protection. If you believe that it has been sent to you in error, do not read it. Please reply to the sender that you have received the message in error, then delete it. Thank you.

From: Christina Henry [<mailto:chenry@hdm-legal.com>]
Sent: Monday, December 07, 2015 10:28 AM
To: Marc Rosenberg <Mr@leesmart.com>
Cc: 'kmiller@millerlawspokane.com' <kmiller@millerlawspokane.com>; Marie Vestal Sharpe
<mvs@leesmart.com>; Jonathan J. Loch <jjl@leesmart.com>
Subject: RE: 15-01332 - Calugas v Patenaude & Felix et al

Thank you.

Christina L. Henry, Attorney
Henry, DeGraaff & McCormick, P.S.
1833 N. 105th St.
Suite 203
Seattle, Washington 98133
Tel 206/330-0595
Fax 206-400-7609
chenry@HDM-legal.com

CONFIDENTIALITY NOTICE: This e-mail may contain information that is protected by the attorney-client and/or the attorney-work product privilege. It is intended only for the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If you are not the intended recipient ANY USE, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. If you have received this communication in error, please immediately notify us by return e-mail or telephone at the e-mail address or telephone number listed above and destroy this transmission and any attachments without reading or saving in any manner. Thank you

From: Marc Rosenberg [<mailto:Mr@leesmart.com>]
Sent: Monday, December 07, 2015 10:19 AM
To: Christina Henry <chenry@hdm-legal.com>
Cc: 'kmiller@millerlawspokane.com' <kmiller@millerlawspokane.com>; Marie Vestal Sharpe
<mvs@leesmart.com>; Jonathan J. Loch <jjl@leesmart.com>
Subject: RE: 15-01332 - Calugas v Patenaude & Felix et al

Christina: I generally believe in extending such professional courtesies when requested. Extension granted. Plaintiffs' responses to the discovery requests are now due on 12/14/15.

Marie: Please re-calendar for me. Thanks.

Marc

From: Christina Henry [mailto:chenry@hdm-legal.com]
Sent: Monday, December 07, 2015 10:15 AM
To: Marc Rosenberg <Mr@leesmart.com>
Cc: 'kmiller@millerlawspokane.com' <kmiller@millerlawspokane.com>
Subject: 15-01332 - Calugas v Patenaude & Felix et al

Marc,

I am writing to you to request a week extension of the discovery due to your client today. We need an additional week to coordinate the sign of from our client Jenny Calugas. Thank you.

Christina L. Henry, Attorney
Henry, DeGraaff & McCormick, P.S.
1833 N. 105th St.
Suite 203
Seattle, Washington 98133
Tel 206/330-0595
Fax 206-400-7609
chenry@HDM-legal.com

CONFIDENTIALITY NOTICE: This e-mail may contain information that is protected by the attorney-client and/or the attorney-work product privilege. It is intended only for the individual named above and the privileges are not waived by virtue of this having been sent by e-mail. If you are not the intended recipient ANY USE, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. If you have received this communication in error, please immediately notify us by return e-mail or telephone at the e-mail address or telephone number listed above and destroy this transmission and any attachments without reading or saving in any manner. Thank you

Exhibit 4

{885844.DOC}

Marc Rosenberg

From: Marc Rosenberg
Sent: Monday, December 21, 2015 9:35 AM
To: 'Christina Henry'; kmiller@millerlawspokane.com
Cc: Marie Vestal Sharpe; Jonathan J. Loch
Subject: RE: 15-01332 - Calugas v Patenaude & Felix et al

Christina:

We would like to hold a discovery conference regarding Plaintiff's overdue discovery requests. Please advise when a good time to hold such a conference will be

Please contact us if you have questions.

Marc Rosenberg | Attorney at Law | [VCard](#) | [Email](#) | [Bio](#)

Lee Smart, P.S., Inc. | 1800 One Convention Place | 701 Pike St. | Seattle,
WA 98101 | www.leesmart.com
Telephone 206.624.7990 | Toll-free 1.877.624.7990 | Fax 206.624.5944 | Direct Line 206.262.8308

CONFIDENTIALITY NOTICE: This email message may be protected by the attorney/client privilege, work product doctrine or other confidentiality protection. If you believe that it has been sent to you in error, do not read it. Please reply to the sender that you have received the message in error, then delete it. Thank you.

From: Christina Henry [mailto:chenry@hdm-legal.com]
Sent: Friday, December 18, 2015 9:18 AM
To: Marc Rosenberg <Mr@leesmart.com>
Cc: kmiller@millerlawspokane.com; Marie Vestal Sharpe <mvs@leesmart.com>; Jonathan J. Loch <jjl@leesmart.com>
Subject: Re: 15-01332 - Calugas v Patenaude & Felix et al

We will have a response today

Christina Henry
Henry, DeGraaff & McCormick, PS
1833 N 105th St SE
Seattle, WA 98133
Tel# 206-330-0595
Fax# +1-206-400-7609
chenry@hdm-legal.com

On Dec 18, 2015, at 8:03 AM, Marc Rosenberg <Mr@leesmart.com> wrote:

Please respond. Thanks.

Marc